CC 98-147

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EX PARTE OR LATE FILED

September 25, 1998

EX PARTE PRESENTATION

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

Re: *In the Matter of Deployment of Advanced Telecommunications and Wireline Services Offering Advanced Telecommunications Capability, FCC 98-188*

CC-98-147

Dear Ms. Salas:

On September 22, 1998 SBC filed an Ex Parte in the above referenced docket regarding loop qualification for Digital Subscriber Line (DSL) service. Two attachments to that Ex Parte letter were inadvertently omitted.

Attached is the referenced September 22, 1998 Ex Parte including the omitted attachments. I apologize for any inconvenience this omission may have caused.

Please include this letter in the record of these proceedings in accordance with Section 1.1206(a)(2) of the Commission's Rules.

Acknowledgment and date of receipt of this transmittal are requested. A duplicate transmittal letter is attached for that purpose.

Please contact the undersigned should you have any questions.

Respectfully submitted,

Lincoln E. Brown

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Director-Federal Regulatory

Attachments

No. of Copies rec'd 0+1
List A B C D E

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September 22, 1998

EX PARTE PRESENTATION

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

Re: In the Matter of Deployment of Advanced Telecommunications and Wireline Services Offering Advanced Telecommunications Capability, FCC 98-188

Regarding the Commission's Order and NPRM in Docket 98-188, SBC, on behalf of Pacific Bell, would like to explain its planned procedures for complying with language addressing loop qualification for Digital Subscriber Line (DSL) service and parity between its retail and wholesale operations. The Order stated:

> 56. Under our existing rules, incumbent LECs are also required to provide competing carriers with nondiscriminatory access to the operations support systems (OSS) functions for pre-ordering, ordering, and provisioning loops. If new entrants are to have a meaningful opportunity to compete, they must be able to determine during the pre-ordering process, as quickly and efficiently as can the incumbent, whether or not a loop is capable of supporting xDSL-based services. An incumbent LEC does not meet the nondiscrimination requirement if it has the capability electronically to identify xDSL-capable loops, either on an individual basis or for an entire central office, while competing providers are relegated to a slower and more cumbersome process to obtain that information. In the NPRM below, we seek comment on whether we should adopt any additional rules to ensure that competing providers have nondiscriminatory access to the loop information they need to provide advanced services.

Pacific Bell currently has 87 wire centers (limited geographic areas served by an individual Central Office) in which it is deploying ADSL. Loop information regarding these wire centers has been loaded into tables to facilitate electronic loop qualification. In Wire Centers where neither Pacific nor any CLEC deploy ADSL technology, electronic loop qualification will not be available. Pacific has committed to include information on Wire Centers that are identified by CLECs as areas in which they wish to deploy DSL technology. Upon written notification of a CLEC's intent to market DSL within a specific wire center, Pacific will update the tables to provide similar electronic loop qualification within 60 days.

In accordance with Docket 98-188, to provide parity in loop qualification, Pacific Bell's retail operations will handle loop qualifications utilizing the following process, on an interim basis. The service representative who receives an inbound call begins the process flow. The service representative will access PREMIS (Pacific's proprietary address system) to quickly ascertain if the loop falls into one of three categories. The first category is a "green" condition, meaning that the loop length is 12,000 feet or less. The Rate Zone (RTZ) field in PREMIS will display "12". In this case, ADSL service may be deployed since ADSL technology is deemed consistent to work at lengths 12,000 feet or under. The Service Representative may then process an order if the end user wishes to purchase the product.

The second category will be a "red" condition, meaning that the loop length is greater than 17,500 feet. The Rate Zone (RTZ) field will display "18". In this case, the end user will be notified online that ADSL service is not available. SBC experience is that technology will not support ADSL on loop lengths greater than 17,500 feet.

The third category will be a "yellow" condition, meaning that the loop length falls between 12,000 and 17,501 feet. The Rate Zone (RTZ) field will display "17". Additional information is needed to qualify the loops in the yellow zone for ADSL service. At this point the Service Representative would inform the end user that additional information is needed to determine if the service can be provided and a call back would be necessary. Off-line, the Service Representative would access WebQual to perform additional qualification and verify any conditioning on the line. (WebQual is Pacific Bell's software system to perform two of the three separate checks for facility availability and loop qualification.) WebQual returns one of two responses - 'OK to Deploy' or 'Not OK to Deploy' (due to 'Digital Loop Carrier (DLC)', 'Loop length too long', 'Loaded cable', 'Disturbers', or Digital Additional Main Line (DAML)). WebQual will automatically trigger the K1023 process when there is: 'No facilities', a 'Need loop makeup', or 'Spectrum Management required'. (The K1023 process is a manual check to determine availability of facilities or further information about the loop.) On 'Not OK to Deploy', the following responses will disqualify the end user: 'DLC' or 'Loop length too long'. A loop under 17,500 with 'Loaded cable' or 'Repeaters' will require conditioning to qualify. The existence of 'Disturbers' or 'DAML' will require the Service Representative (retail or wholesale) to follow the K1023 process. If the response indicates 'Bridge tap' or 'Loaded cable' (requires conditioning), the Service Representative in the Emerging Products Centers will call the end user and advise them that ADSL can be provided. An additional charge to remove these impairments may be applicable.

To meet CLECs' needs and create parity in loop qualification, Pacific is enhancing its OSS offering in DataGate and Verigate to recognize the additional field in PREMIS dedicated to the Rate Zone (RTZ) field or initial qualification of loop length. This enhancement is scheduled for release on September 27, 1998. A CLEC may choose one of two methods to ascertain an initial loop qualification. They may manually request pre-qualification through the Customer Care Center within the Local Service Center (LSC) or they may utilize DataGate or Verigate to access PREMIS to receive the "red", "green" or "yellow" indicator as indicated in the RTZ field.

With the end user on the line, a CLEC may access this Pre-Order information. Within the first category of "green" (loop length 12,000 feet or less), the Rate Zone (RTZ) field will display "12". The CLEC may issue an order if the end user wishes to purchase the DSL service.

In the second category of "red" (loop length greater than 17,500 feet), the Rate Zone (RTZ) field will display "18". The CLEC may either immediately inform the end user that DSL services are not available. Or, if the CLEC feels that Pacific's criteria are restrictive to their individual technology, they may request additional information regarding specific loop length from the LSC. This would require a call back to the end user.

In the third category of "yellow" (loop length between 12,000 and 17,501 feet), the Rate Zone (RTZ) field will display "17". The CLEC would inform the end user that additional information is needed to qualify the loop for DSL services. A call back is necessary. The CLEC would then call the LSC where a Pacific Bell Service Representative will access WebQual to perform additional qualification. WebQual will return one of two responses - 'OK to Deploy' or 'Not OK to Deploy' (due to 'Digital Loop Carrier (DLC)', 'Loop length too long', 'Loaded cable', 'Disturbers', or DAML). WebQual will automatically trigger the K1023 process when the response is 'No facilities', a 'Need loop makeup', or 'Spectrum Management required'. On 'Not OK to Deploy', the following responses will disqualify the end user: 'DLC' or 'Loop length too long'. A loop under 17,500 with 'Loaded cable' or 'Repeaters' will require conditioning to qualify. The existence of 'Disturbers' or 'DAML' will require the Service Representative (retail or wholesale) to follow the K1023 process. If the response indicates 'Bridge tap' or 'Loaded cable' (requires conditioning), the CLEC can advise its end user that DSL service is available. Pacific will remove these impairments at no charge to the CLEC per contractual agreements. Therefore, CLECs will be able to qualify end users for DSL services at less expense then Pacific does for its own end users.

Verigate or DataGate may also return a "blank" field in the RTZ. This indicates that Pacific has not deployed ADSL service within the Wire Center serving the customer address. If the CLEC is providing DSL service in this area, it may contact Pacific through its Account Manager to have the loop qualification information updated to include this Wire Center.

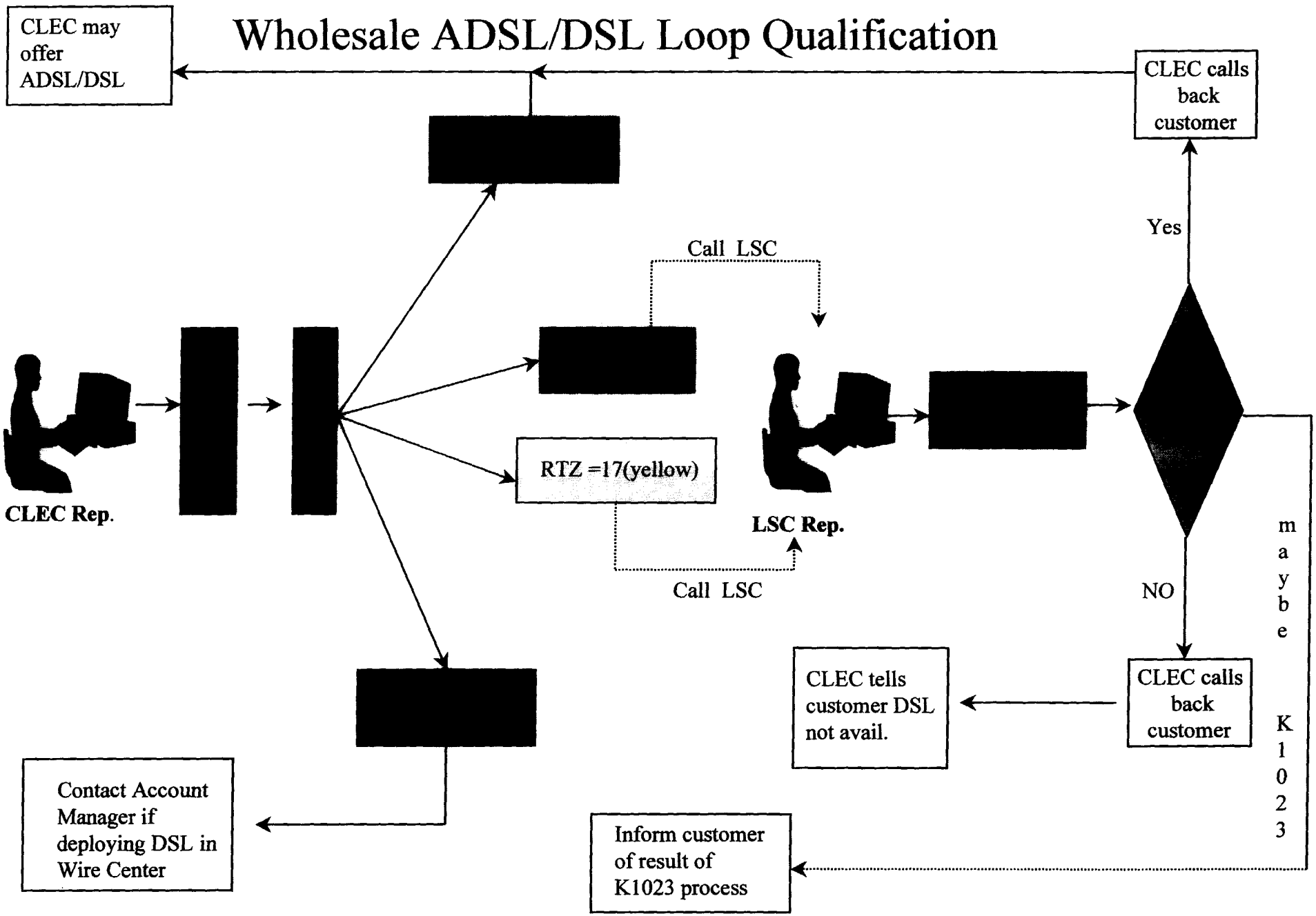
SBC and Pacific are committed to providing the Wholesale community an electronic means of qualifying loops for ADSL services. This ability will not only enhance the CLECs capabilities but will additionally reduce the resources that Pacific needs to support to the process. Preliminary meetings are being held to address the long-term solution. Information regarding time frames for development and completion should be available by October 1998.

The attached diagrams depict our current parity solution, as it will be implemented for both wholesale and retail scenarios on September 28, 1998.

Please include this letter in the record of these proceedings in accordance with Section 1.1206(a)(2) of the Commission's Rules.

Linda E. Brown

Wholesale ADSL/DSL Loop Qualification



Retail ADSL Loop Qualification